

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff/Petitioner,

v.

**ALLEN PERRES and
WILLARD R. ST. GERMAIN,**

Defendants/Respondents.

Case No.: 1:20-cv-07376

Judge John J. Tharp, Jr.
Magistrate Judge Jeffrey T. Gilbert

**THE SECURITIES AND EXCHANGE COMMISSION'S
MOTION FOR ENTRY OF FINAL JUDGMENT**

Plaintiff, the Securities and Exchange Commission (the "Commission" or "SEC"), moves this Court for Entry of Final Judgment against Defendants/Respondents, Allen M. Perres ("Perres") and Willard R. St. Germain ("St. Germain") (collectively, "Respondents"), pursuant to Section 20(c) of the Securities Act of 1933 ("Securities Act"), 15 U.S.C. § 77t(c), and Section 21(e) of the Securities Exchange Act of 1934 ("Exchange Act"), 15 U.S.C. § 78u(e)(1).

BACKGROUND

1. On December 21, 2015, the Commission entered its Order Instituting Administrative and Cease-and-Desist Proceedings ("OIP") against Respondents, pursuant to Section 8A of the Securities Act and Sections 15(b) and 21C of the Exchange Act. (*See* ECF No. 1-2). In accordance with the OIP:(a) Perres agreed to disgorge \$125,145 plus prejudgment interest of \$8,805, and further proceedings to determine whether any injunctive relief should also be

imposed;¹ and (b) St. Germain agreed to disgorge \$223,836 plus prejudgment interest of \$14,071, and the imposition of certain injunctive relief.²

2. On December 14, 2020, the Commission filed an Application for an Order under Section 20(c) of the Securities Act and Section 21(e)(1) of the Exchange Act Enforcing Compliance with a Commission Order (“Application”). (ECF No. 1).

3. On December 15, 2020, the Court issued an order for Respondents to show cause (“Order to Show Cause”) why the final SEC order entered against them should not be enforced. (ECF No. 4). Each Respondent was ordered to respond to the Commission’s Application, in writing, within 28 days of service. Pursuant to the Order to Show Cause, “[f]ailure to timely respond may result in entry of an order enforcing the Commission Order, contempt proceedings, and other sanctions.”

4. On December 16, 2020, the Application and Order to Show Cause were served on both Perres and St. Germain. (ECF Nos. 5-6).

5. Respondents failed to respond to the Court’s Order to Show Cause. Therefore, the Commission requests that the Court enter final judgments against Respondents Allen M. Perres and Willard R. St. Germain in the form of the proposed Final Judgments attached to this motion.

WHEREFORE, the Commission respectfully requests that this Court grant the Application, enter a final judgment against the Respondent, and provide such other relief the Court deems appropriate.

¹ Payment of the disgorgement and prejudgment interest amounts was waived except for \$31,284 based on Perres’ sworn representations in his Statement of Financial Condition to the SEC dated August 14, 2015.

² Payment of the disgorgement and prejudgment interest amounts was waived except for \$55,956 based on St. Germain’s sworn representations in his Statement of Financial Condition to the SEC dated August 1, 2015.

Dated: June 30, 2021

Respectfully submitted,

s/CHRISTY J. WHITE

CHRISTY J. WHITE

Assistant Chief Litigation Counsel

100 F Street, NE, Mail Stop 5628

Washington, DC 20549-5628

WhiteChr@SEC.gov

Telephone: 202.551.4502

Facsimile: 804.708.6119

Attorney for Plaintiff/Judgment Creditor
United States Securities and Exchange Commission

CERTIFICATE OF SERVICE

I certify that on June 30, 2021, I electronically filed the foregoing with the Clerk of the Court using the ECF system, which will send notification of such filing to all parties of record, via email to Respondent Allen Perres at Aperres@stonearchinc.com, and via UPS overnight mail to:

Allen Perres
3406 Seminary Avenue N
Chicago, IL 60657; and

Willard St. Germain
5N320 Powis Road
Wayne, IL 60184.

/s/Christy J. White
CHRISTY J. WHITE
Assistant Chief Litigation Counsel
United States Securities and Exchange Commission
100 F Street, NE, Mail Stop 5628
Washington, DC 20549-5628
WhiteChr@SEC.gov
Telephone: 202.551.4502
Facsimile: 202.572.1372
Attorney for Plaintiff/Judgment Creditor